

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF BIRMINGHAM FIREMEN’S AND
POLICEMEN’S SUPPLEMENTAL
PENSION SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

RYANAIR HOLDINGS PLC and MICHAEL
O’LEARY,

Defendants.

18 Civ. 10330 (JPO)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on November 6, 2018, Plaintiff City of Birmingham Firemen’s and Policemen’s Supplemental Pension System filed a putative class action complaint asserting claims pursuant to the Securities Exchange Act of 1934 (“Complaint”) against Defendants Ryanair Holdings plc and Michael O’Leary (“Defendants”);

WHEREAS, the claims asserted in the Complaint in this action are governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4, which provides a procedure for the appointment of lead plaintiff(s) and lead counsel to represent the putative class by the Court;

WHEREAS, on January 24, 2019, the Court appointed City of Birmingham Firemen’s and Policemen’s Supplemental Pension System and City of Birmingham Retirement and Relief System (together, the “Birmingham Funds” or “Plaintiffs”) as Lead Plaintiff and Robbins Gellar Rudman & Dowd LLP as Lead Counsel (Dkt No. 15);

WHEREAS, Plaintiffs and Defendants (the “Parties”) have agreed to the proposed schedule set forth below;

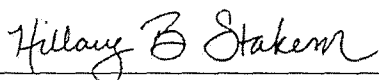
IT IS HEREBY STIPULATED AND AGREED by and between the Parties, through their undersigned counsel, subject to approval by the Court, as follows:

1. Plaintiffs will file an amended complaint, no later than April 5, 2019.
2. Defendants will file a motion to dismiss or otherwise respond to the operative complaint no later than June 14, 2019.
3. If Defendants file a motion to dismiss, Plaintiffs will oppose that motion no later than August 23, 2019 and Defendants will file a reply brief no later than October 11, 2019.
4. There have been no requests for an extension of time previously made in this matter.
5. Nothing in this Stipulation shall be construed as a waiver of any defense available to Defendants.
6. This Stipulation may be signed in counterparts.

Stipulated and agreed to by:

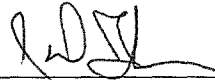
Dated: February 26, 2019

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Counsel for Lead Plaintiffs

IT IS SO ORDERED.

DATED: _____

THE HONORABLE J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE